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*Bristol Bay Area
Health Corporation is
a tribal organization
representing 28 villages in
Southwest Alaska:*

Aleknagik
Chignik Bay
Chignik Lagoon
Chignik Lake
Clark's Point
Dillingham
Egegik
Ekuk
Ekwok
Goodnews Bay
Ivanof Bay
Kanatak
King Salmon
Knugank
Koliganek
Levelock
Manokotak
Naknek
New Stuyahok
Perryville
Pilot Point
Platinum
Port Heiden
Portage Creek
South Naknek
Togiak
Twin Hills
Ugashik

*Our mission is to
provide quality
health care with
competence and
sensitivity*

May 24, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Rural Health Care Universal Services Support, WC Docket No. 02-60,
Actions to Accelerate Broadband-Enabled Health Care Solutions, GN
Docket No 16-46

Dear Chairman Pai and FCC Commissioners:

I am writing to ask for your support to ensure that Alaskans continue to have access to affordable broadband tele-health services in rural and tribal communities. We ask that you take steps to ensure both the near and long-term viability of the Rural Health Care Program to meet the increased demand for telemedicine services both in Alaska and across the nation.

Background

The Bristol Bay Area Health Corporation (BBAHC) was created in 1973 to provide health care services to the Alaska Native people of Southwest Alaska. We began operating and managing the Kanakanak Hospital and the Bristol Bay Service Unit for the Indian Health Service (IHS) in 1980, and were the first tribal organization to do so under the Indian Self-Determination and Education Assistance Act (ISDEAA). BBAHC is now responsible for and successfully providing and promoting health care to 28 Alaska Native Villages.

For many years the BBAHC has been a recipient of the Rural Health Care (RHC) Universal Service Support, specifically under the Telecommunications Program. These program funds have been key for our organization to deploy and use telehealth tools supporting high speed broadband that has become a platform for 21st Century Electronic Health Records that can be shared securely with other medical providers to directly improve patient care throughout Alaska. In addition, the support helps us to alleviate the high costs of transportation associated with travel to and from rural Alaska. The proposal by the FCC to pro-rate subsidies for Internet service is a potentially devastating development that would undermine BBAHC's ability to provide adequate health care services to our tribal communities.

Devastating Impacts

We were informed by the USAC Rural Health Care Program that because the total dollar value of all qualifying funding requests received by the close of the second filing window period (\$274,725,249) exceeded the RHC Program funding available (\$254,255,017) at the beginning of the filing window period, all qualifying funding requests will receive a pro-rated percentage of the qualifying funding requested; a reduction of 7.5%.

BBAHC will be significantly impacted by this reduction in funding and as a result will likely have to reduce or interrupt the broadband services currently used that allow us to provide healthcare. The outcome is likely to be a substantial reduction in patient health care services, which could adversely affect the lives of thousands of Alaskans.

BBAHC is very concerned that if funding requests are reduced (pro-rated) or denied entirely, the continuity of our existing and new rural health care services will be put in immediate jeopardy. Our health organization currently receives a subsidy from the Universal Administrative Company (USAC) that offsets our Internet expenses so we are able to connect through satellite. Our current payment is \$94,000 per month. Under the FCC proposal our payments would increase to \$175,000 per month. In other words, an annual increase of \$2.72 million.

The BBAHC is not able to pay for such a substantial increase for the cost of Internet connectivity. This increase will affect not only our health organization, but would negatively impact the entire Alaska Tribal Health System in the State of Alaska. Connectivity is the lifeline for health services in our state where a majority of rural communities are not connected to a road system. BBAHC serves a vast area covering 28 tribal villages and currently has a USAC Internet subsidy to allow the organization to connect through satellite.

Improve Rural Healthcare Services

Telemedicine has allowed our tribal health organization to dramatically improve access to care, accelerate diagnosis and treatment, avoid unnecessary emergency transportation, expand local treatment options, and help to reduce Medicaid costs. Our health facilities are not able to raise service rates to compensate for the increase in costs to cover the proposed pro-ration.

We believe that the FCC should increase the budget for the rural health care support mechanisms to reflect inflation over the past two decades. Please urge the FCC to increase the Rural Health Care Universal Service Support budget, index it for inflation, and provide for any unused funds to be carried forward to future funding years.

Thank you for your consideration and attention to this urgent matter.

Respectfully,



Robert J. Clark, President & CEO

CC:

The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young